(702) 563-4450 FAX: (702) 552-0408

26

27

28

///

///

///

1 Kevin L. Hernandez, Esq. Nevada Bar No. 12594 2 LAW OFFICE OF KEVIN L. HERNANDEZ 3 8872 S. Eastern Avenue, Suite 270 Las Vegas, Nevada 89123 4 T: (702) 563-4450 F: (702) 552-0408 5 kevin@kevinhernandezlaw.com Attorney for Plaintiff 6 UNITED STATES DISTRICT COURT 7 8 DISTRICT OF NEVADA 9 DEBORAH A. CARROLL, an individual; Case No.: 2:20-cv-01728-KJD-EJY 10 Plaintiff, 11 STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFF V. 12 TO FILE A RESPONSE TO DEFENDANT'S MOTION TO DISMISS 13 MEDICREDIT, INC., a foreign corporation; OR STAY PLAINTIFF'S COMPLAINT 14 Defendant. [Second Request] 15 Plaintiff, Deborah A. Carroll ("Plaintiff"), and Defendant, Medicredit, Inc., ("Medicredit") 16 have agreed to extend the time for Plaintiff to file a Response to Medicredit's Motion to Dismiss 17 or Stay Plaintiff's Complaint [ECF No. 5] ("Motion to Dismiss") to November 24, 2020. 18 19 Medicredit filed its Motion to Dismiss on October 13, 2020 and the current response deadline is 20 November 10, 2020. 21 The parties request this brief extension to permit them to discuss possible resolution of this 22 matter. The extension will allow the parties to further explore settlement options without 23 expending unnecessary attorneys' fees and costs. 24 /// 25 ///

## Case 2:20-cv-01728-KJD-EJY Document 10 Filed 11/10/20 Page 2 of 2

				1
				2
Law Office of Kevin L. Hernandez	8872 S. Eastern Avenue Suite 270	Las Vegas, Nevada 89123		3
				4
				1 2 3 4 5 6 7 8 9
				6
				7
				8
				9
				10
				11
			80	12
			(702) 563-4450 FAX: (702) 552-0408	13
			(702) 5	14
			0 FAX:	15
			563-445	16 17
			(702)	
				18 19
				19
				20
				21
				22
				23
				24
				25
				26
				27
				28

7	This is the secon	nd request for	an extension	to respond to	Medicredit's	Motion to	Dismiss
and this	request is made	in good faith	and not for th	ne purpose of	delay.		

Dated: November 5, 2020 Dated: November 5, 2020

## LAW OFFICE OF KEVIN L. HERNANDEZ

/s/ Kevin L. Hernandez Kevin L. Hernandez, Esq. Nevada Bar No. 12594 8872 S. Eastern Avenue, Suite 270 Las Vegas, Nevada 89123 kevin@kevinhernandezlaw.com Attorney for Plaintiff

## **SPENCER FANE LLP**

/s/ Mary E. Bacon Mary E. Bacon, Esq. Nevada Bar No. 12686 300 South 4th Street, Suite 950 Las Vegas, Nevada 89101 mbacon@spencerfane.com Attorney for Defendant Medicredit, Inc.

IT IS SØ ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: <u>11/10/2020</u>